REMARKS

Claims 1-24 are pending to the present application. By virtue of this response, claim 1 has been amended. Accordingly, claims 1-24 are currently under consideration. Amendment or cancellation of certain claims is not to be construed as dedication to the public of any of the subject matter of the previously presented.

Claim Rejection under 35 U.S.C. § 102

Claims 1-5 stand rejected under 35 U.S.C. 102(b) as allegedly being anticipated by Arkin et al. (6,028,439). Applicants respectfully traverse this rejection.

As amended, the Arkin reference does not teach or disclose the claim element "wherein the at least one site controller does not share a common clock." As shown in Figure 1 of the Arkin reference, a common clock MCLK is used to drive the test modules, which allegedly contains the site controller. In the present application, the site controllers do not share the same common clock. In addition, the Arkin reference does not teach or disclose the claim element "wherein the associated site controller controls at least one test module interactively with the associated site controller in a plug-and-play manner." As shown in Figure 1 and Figure 2 of the Arkin reference, the microcontroller (Fig.2, 30) is within the test module (Fig. 1, 14), thus the test module can not be detached and/or attached from the microcontroller interactively in a plug-and-play manner. This is consistent with Applicants previously presented arguments that the site controller and the test module are different entities, and the Arkin reference does not teach or disclose the site controller.

Applicants submit that the Arkin reference describes a closed tester architecture where vendor-specific operating system and software are used in controlling the tester system. The closed tester architecture uses dedicated hardware and software, such as a common master clock (MCLK, see Arkin, Fig. 1, 15), to test a particular device-under-test (DUT). On the other hand, the present invention describes an open architecture tester system, where hardware and software framework of the tester system that include standard interfaces are described that allow test modules from different vendors to interact with each other in a plug-and-play manner. In light of the open architecture tester

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system, Applicants also submit that the Arkin reference does not teach or disclose the system controller of the present invention.

Furthermore, Applicants submit that Arkin discloses a tester system having the structure of **Host-Test Module (s)-DUT(s)**, which is shown in Figure 1 of the Arkin reference. However, the present invention discloses a tester system having the structure of **System Controller-Site Controller(s)-Test Module(s)-DUT(s)**, which is shown in Figure 2 of the present application. The microcontroller (see Arkin, Fig.2, 30) within each test module (see Arkin, Fig. 1, 14) is part of the test module, which is not the site controller of the present invention. Because the site controller is not found in the Arkin reference, the Arkin reference does not teach or disclose at least some of the features of the site controller of the present invention, such as the ability to run on a different local operating system, to be coupled to multiple test modules, and to have different hardware implementations, as described in the December 5, 2005 response to the final Office Action.

Claim Rejection Under 35 U.S.C. § 103

Claims 6-8, 24 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Arkin (6,028,439) as in view of Adler (US 2002/0183955 A1). Claims 9-14 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Arkin and Adler as applied to claims 6-8 above, and further in view of Hejlsberg at al. (US 2003/0167277 A1). Claim 20 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Arkin, Adler, and Hejlsberg as applied to claims 9-14 and 19 above, and further in view of Shah (6,782,336).

In response, for at least the reasons presented above, since the Arkin reference does not disclose each and every element of the independent claim 1, its dependent claims 2-24 can not be found obvious over Arkin et al. in view of cited references to Adler, Hejlsberg, and Shah.

Support for the Amended Claim 1:

The support for the amended claim 1 is found in Figures 1, and its corresponding descriptions.

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CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. 33377-2000900. However, the Commissioner is not authorized to charge the cost of the issue fee to the Deposit Account.

Dated: April 13, 2006   Respectfully submitted,
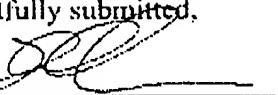
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